

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20462

RQ-2

Donna M. Anderson, Treasurer
National Republican Congressional Committee –
Expenditures
320 First Street
Washington, DC 20003

Identification Number:

-000075820

SEP 1 1 2002

Reference:

Amended March Monthly Report (2/1/01-2/28/01) received 4/17/02

Dear Ms. Anderson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses in-kind contributions ("donations") from corporations on Schedule H4, supporting Line 21(a) of the Detailed Summary Page (pertinent portions attached). Pursuant to Advisory Opinion 1992-33, the Commission concluded that a "national party committee may accept corporate in-kind donations in connection with fundraising activities" as long as "the federal share of goods or services is paid or transferred to the non-federal account in advance" of the acceptance of the corporate in-kind donations by the federal account.

Advisory Opinion 1992-33 also discloses a detailed method for reporting the receipt and use of in-kind contributions as follows:

- 1. The transfer of the in-kind corporate contribution from the non-federal account to the federal account should be disclosed on Schedule H3. The itemization on Schedule H3 should include the date the Committee received the in-kind contribution, the amount of the contribution and the fundraising event involved.
- The use or expenditure of in-kind corporate contributions should be disclosed on Schedule H4 as non-federal share disbursements. The